

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

**UNICARE LIFE & HEALTH INSURANCE  
COMPANY,**

**CASE NO. 5:18-cv-000923-TAD-MLH**

**Plaintiff,**

**VERSUS**

**ROSLYN HEROD GILBERT, TRULANDA  
F. WELLS, ROSLYN GILBERT, JAMES D.  
HUNTER, and LARRY GILBERT**

**HON. : \_\_\_\_\_**

**Defendants**

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**ANSWER**

NOW INTO COURT, through undersigned counsel, comes Roslyn Herod Gilbert, a resident of the State of Louisiana, Defendant in the above captioned matter, who respectfully answers as follows:

1.

The allegations contained in Paragraph one of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

2.

The allegations contained in Paragraph two of Plaintiff's Complaint are admitted.

3.

The allegations contained in Paragraph three of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

4.

The allegations contained in Paragraph four of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

5.

The allegations contained in Paragraph five of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

6.

The allegations contained in Paragraph six of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

7.

The allegations contained in Paragraph seven of Plaintiff's Complaint are admitted.

8.

The allegations contained in Paragraph eight of Plaintiff's Complaint are admitted.

9.

The allegations contained in Paragraph nine of Plaintiff's Complaint are admitted.

10.

The allegations contained in Paragraph ten of Plaintiff's Complaint are admitted.

11.

The allegations contained in Paragraph eleven of Plaintiff's Complaint are admitted.

12.

The allegations contained in Paragraph twelve of Plaintiff's Complaint are admitted. Defendant, Roslyn Herod-Gilbert further answers that she is the rightful beneficiary of the policy which is the subject of this litigation and should be recognized as such and paid the Benefit of the Policy at issue.

13.

The allegations contained in Paragraph thirteen of Plaintiff's Complaint are admitted.

14.

The allegations contained in Paragraph fourteen of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

15.

The allegations contained in Paragraph fifteen of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

16.

The allegations contained in Paragraph sixteen of Plaintiff's Complaint are admitted.

17.

The allegations contained in Paragraph seventeen of Plaintiff's Complaint are admitted.

18.

The allegations contained in Paragraph eighteen of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

19.

The allegations contained in Paragraph nineteen of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

20.

The allegations contained in Paragraph twenty of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

21.

The allegations contained in Paragraph twenty-one of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

22.

The allegations contained in Paragraph twenty-two of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

23.

The allegations contained in Paragraph twenty-three of Plaintiff's Complaint are denied for lack of sufficient information to justify a belief therein.

WHEREFORE, Defendant, Roslyn Herod Gilbert, prays that after all due proceedings are had this Court find Roslyn Herod Gilbert's answer sufficient and that after all just delays and proceedings there be judgment in her favor declaring her to be the true beneficiary to the life insurance policy at issue and entitling her to the entire amount of the benefit of life insurance policy.

DEFENDANT FURTHER PRAYS for all other general and equitable relief to which she may be entitled.

Respectfully Submitted,

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**Attorney for Roslyn Herod Gilbert**